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DELL INC. and DELL PRODUCTS L.P.

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

16 IN RE: LITHIUM ION BATTERIES ANTITRUST  
LITIGATION

17 This Document Relates to: Individual Case  
No. 15-cv-02987-YGR

18 DELL INC. AND DELL PRODUCTS L.P.

19 PLAINTIFFS,

20 V.

21 LG CHEM, LTD., ET AL.

22 DEFENDANTS.  
23

Case No.: 4:13-md-02420-YGR (DMR)

MDL No. 2420

**STIPULATION OF DISMISSAL OF LG  
CHEM AMERICA, INC. AND LG CHEM,  
LTD.**

Hon. Yvonne Gonzalez Rogers

24 Plaintiffs Dell Inc. and Dell Products L.P. (collectively, "Dell") and Defendants LG Chem  
25 America, Inc. and LG Chem, Ltd. (collectively "LG Chem"), by and through undersigned counsel,  
26 stipulate and agree that Dell hereby dismisses with prejudice all claims being asserted against LG  
27  
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Chem in the above-captioned action pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

In support of this stipulation of dismissal, the parties state as follows:

1. Dell and LG Chem seek the dismissal of this action with prejudice.
2. This stipulation does not affect the rights or claims Dell may have against any other defendant or alleged co-conspirator in this litigation.
3. Each side shall bear its own costs and attorneys' fees.

WHEREFORE, the parties respectfully request that this Court issue the Proposed Order of Dismissal.

**IT IS SO STIPULATED.**

Dated: August 30, 2017

**ALSTON & BIRD LLP**

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15 *Chem America, Inc.*

16 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this  
17 document has been obtained from the signatories thereto.  
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